



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

GK/KCB/DEL/NCG/SMF  
F. #2018R01401

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 17, 2024

By ECF

The Honorable Diane Gujarati  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Cherwitz, et al.  
Criminal Docket No. 23-146 (DG)

Dear Judge Gujarati:

In accordance with the Court's order at the December 10, 2024 status conference in the above-captioned matter, the government writes to attach and publicly file unredacted copies of the following court filings:

- ECF Docket No. 112 (Letter Regarding Potential Witnesses), attached hereto as Exhibit A.
- ECF Docket No. 114 (Letter in Opposition to Government's July 31, 2024 Letter), attached hereto as Exhibit B.
- ECF Docket No. 116 (Letter Reply in Support of July 31, 2024 Letter Regarding Potential Witnesses), attached hereto as Exhibit C.
- ECF Docket No. 178 (Excerpt - Defense Expert Disclosure for Dr. Robert Leonard), attached hereto as Exhibit D.

Defense counsel have indicated that they agree that the above-referenced filings should be unsealed. The government understands that defense counsel may seek to unseal

additional documents following the submission of this filing. The government respectfully requests that the other submissions that the Court has ordered remain under seal continue to remain under seal for the reasons identified in those applications. Indeed, many other filings attached materials that are subject to the governing protective order in this case. The government will continue to meet and confer with defense counsel as to any other filings it wishes to unseal.

Respectfully submitted,

BREON PEACE  
United States Attorney

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